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Attorneys for Mr. Garcia-Carrizoza

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAVIER GARCIA-CARRIZOZA,

Defendant.

) U.S.D.C. NO. 07CR2968-JTM

) Date: December 7, 2007

) Time: 11:00 a.m.

) NOTICE OF MOTIONS AND MOTIONS TO:

) 1) COMPEL DISCOVERY AND PRESERVE
EVIDENCE; AND

) 2) LEAVE TO FILE FURTHER MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
RANDY JONES, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on December 7, 2007, at 11:00 a.m. or as soon thereafter as counsel may be heard, the defendant, Javier Garcia-Carrizoza, by and through his counsel, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

The defendant, Javier Garcia-Carrizoza, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) to compel discovery and preserve evidence; and
- 2) for leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: November 27, 2007

/s/ Shaffy Moeel

SHAFFY MOEEL

Federal Defenders of San Diego, Inc.
Attorneys for Garcia-Carrizoza